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DISTRICT OF DELAWARE

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SS

James L. Martin, plaintiff : Civil Action No. 85-00053-LS

v. : Jury Trial Demanded

Delaware Law School of Widener University, Inc., Commonwealth of
Pennsylvania Department of Transportation, Bureau of Traffic Safety
Operations, et. al., defendants

Plaintiff's Memorandum of Law in support of
Motion for Reargument of Motion to Reopen

ALLEGATIONS OF FACTS

I, James L. Martin, certify the following statements to be true to the best
of my knowledge and information this 20th day of June 2008, and further
certify that they are made under oath in accord with 28 USC Sec. 1746:

1. The event to warrant the Motion to Reopen began on 5-24-07, and
the decision's focus on the "Background" is misplaced.

2. Judge Farnan's involvement would be continuing now but for his
nexus to the principal defendant, when he was a paid staff member and
misrepresented his involvement on that point for several years, despite an
unappealed, final administrative judgment against the same principal
defendant.

3. At a hearing on 10-9-07, in New Jersey, the presiding judge read the
file, explained that the case was mishandled by the court administrator, and
offered to take measures to correct certain official records in Trenton. The

issues there may also relate to this case insofar as the New Jersey transcript, just issued on 6-9-08, is certified as a "compressed" transcript. In fact, the transcript was truncated, so that only the introduction for the hearing was transcribed.

4. The State of New Jersey told the presiding judge it is an "unusual situation."

5. The contents of the entire transcript will be made available as soon as they are issued.

6. The cover page correctly reads: "TRANSCRIPT ORDERED BY: SENATE, STATE OF DELAWARE, Legislative Hall, Dover, Delaware 19903." Why would the Delaware State Senate squander resources on a "frivolous" case?

CONCLUSION

This motion for reargument of the motion to reopen should be granted, in view of the continuing need to clarify the record, compel the defendants to restore various rights taken for many years without notice, hearing, or cause, and to pay extensive damages, attorney's fees, costs, and prejudgment interest as well.

DATED: June 20, 2008

BY: James L. Martin
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CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of Plaintiff's
Plaintiff's Memorandum of Law in Support of Motion for Reargument of
Motion to Reopen upon the remaining opposing counsel of record for the
defendants at the following address:

Somers Price, Jr., Esq.; POTTER, ANDERSON & CORROÓN; P. O. Box
951; Wilmington, DE 19899

by first-class, postage prepaid mail this 20th day of June 2008.

BY: James L. Martin

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